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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Karen Moe Humphreys,

No. C 04 3808 SI

Plaintiff,

v.

Regents of the University of California, University
of California, Berkeley, Department of
Intercollegiate Athletics and Recreational Sport
Steve Gladstone, in his individual and official
capacity, and Mark Stevens, in his individual and
official capacity,

Defendants.

STIPULATION RE DISCLOSURES TO
EXPERTS OR CONSULTANTS OF
DOCUMENTS SUBJECT TO
PROTECTIVE ORDER AND ORDER
[PROPOSED]



WHEREAS, the parties have agreed on a procedure for disclosing the identities of experts and consultants with whom "Confidential" documents subject to the Amended Stipulated Protective Order ("Protective Order") are shared,

IT IS STIPULATED that:

1. If Plaintiff shares documents subject to the Protective order with experts and/or consultants in advance of the date for disclosure of experts, Plaintiff shall within 24 hours document with the

1 Court containing the name(s) of any expert(s) or consultant(s) with whom the documents subject to
2 the Protective Order, including the Bates numbers of said documents, have been shared.

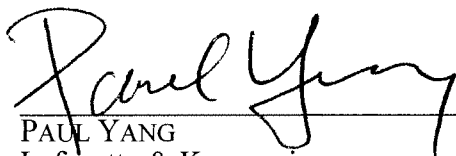
3 2. The document shall filed "under seal" with the Court and shall contain the following
4 designation on its cover:


5 **CONFIDENTIAL**

6 THIS DOCUMENT IS FILED BY PLAINTIFF PURSUANT TO THE
7 STIPULATION AND ORDER FILED JAN. __, 2006, AND SHALL NOT BE
8 DISCLOSED TO DEFENDANTS PRIOR TO THE DATE SET FOR
9 DISCLOSURE OF EXPERTS WITHOUT FURTHER ORDER OF THE
COURT. THIS ENVELOPE IS NOT TO BE OPENED NOR ARE THE
CONTENTS TO BE EXAMINED, DISPLAYED, REVEALED OR COPIED
EXCEPT IN COMPLIANCE WITH THE STIPULATION AND ORDER.

10 3. Plaintiff shall not be required to provide the names of the expert(s) or consultant(s) to
11 Defendants in advance of the date set for disclosure of experts so long as the above referenced
12 document is filed with the Court;

13 4. On the date set for disclosure of experts, Plaintiff shall provide to Defendants copies of any
14 document(s) filed with the Court setting forth the above-noted information.

15
16
17  1/5/06
18 PAUL YANG DATE
19 Lafayette & Kumagai
Attorneys for Defendants

 1-5-06
ANDREW THOMAS SINCLAIR DATE
Sinclair Law Office
Attorneys for Plaintiff

20
21 **ORDER**

22 Pursuant to the above stipulation,

23 IT IS SO ORDERED.

24 DATED: _____
25

26
27
28
SUSAN ILLSTON
United States District Judge

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